

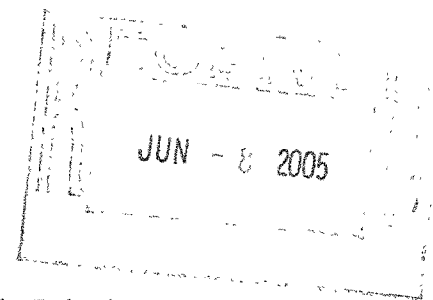


June 1, 2005

1752 5 JUN 22 P2:19

Ortho Molecular Products Inc.
3017 Business Park Drive
P.O. Box 1060
Stevens Point, WI 54481
715.342.9881 Phone
800.332.2351
715.342.9866 Fax
orthomolecularproducts.com

Office of Special Nutritional (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835



Dear Sir/Madam:

This letter will serve as notification, pursuant to section 403 (r)(6) of the Federal Food, Drug, and Cosmetic Act and 21 CFR 101.93, that Ortho Molecular Products, Inc. is using the following claim on its label (see attached labels on page 2).

Name of Manufacturer: Ortho Molecular Products, Inc.
3017 Business Park Drive
P.O. Box 1060
Stevens Point, WI 54481

Statement Text: Muscular / Skeletal Health, Women's Health, Premium Bone Building

Dietary Ingredients: Vitamin D3 (as Cholecalciferol), Vitamin K (as Phytonadione), Folic Acid, Calcium (as Hydroxapatite, Citrimal), Phosphorus (as Chelate), Magnesium (as Buffered Amino Acid Chelate, Citrate, Aspartate), Selenium (as Amino Acid Complex), Copper (as Lysinate), Manganese (as Chelazome), Molybdenum (as Amino Acid Chelate), Ipriflavone, Strontium Citrate, Montmorillonite, Boron (as Proteinat), Natural vegetable capsules, Cranberry Juice Concentrate, Turmeric Root Extract, Ascorbyl Palmitate, Microcrystalline Cellulose, Magnesium Stearate, Silicon Dioxide.

Dietary Supplement Name: Pro Bono

As required, enclosed are two photocopies of this notification.

I certify that the information presented and contained in this notice is complete and accurate, and that Ortho Molecular Products, Inc. has substantiation that the statement is truthful and not misleading.

Sincerely,

Melissa Slager
Document Control / Training Manager
Ortho Molecular Products

97S 0162

LET

16 288

Ortho Molecular Products Pro Bono
6/1/2005
Page 1 of 2



Ortho Molecular Products Inc.
 3017 Business Park Drive
 P.O. Box 1060
 Stevens Point, WI 54481
 715.342.9881 Phone
 800.332.2351
 715.342.9866 Fax
 orthomolecularproducts.com

Attachment of Pro Bono Labels

**ORTHO
MOLECULAR
PRODUCTS**
 Efficacy Matters®

Bono™
 The Building Pack¹

Supplement Facts					
Serving Size 2 Packets					
Servings Per Container: 30					
	Clear/White Packet	Clear/Clear Packet	Combined Packets		
	Amount Per Serving	% Daily Value	Amount Per Serving	% Daily Value	
2 packets contain					
Vitamin D3	500 IU	125%	500 IU	125%	1000 IU 250%
(as Cholecalciferol)					
Vitamin K	500 mcg	625%	500 mcg	625%	1 mg 1250%
(as Phyltonadione)					
Folic Acid	400 mcg	100%	400 mcg	100%	800 mcg 200%
Calcium	900 mg	90%	100 mg	10%	1000 mg 100%
(as Hydroxyapatite, Citrimal®)					
Phosphorus (as Chelate)	7.5 mg	1%	7.5 mg	1%	15 mg 2%
Magnesium	200 mg	50%	200 mg	50%	400 mg 100%
(as Buffered Amino Acid Chelate, Citrate, Aspartate)					
Selenium	100 mcg	143%	100 mcg	143%	200 mcg 286%
(as Amino Acid Complex)					
Copper (as Lysinate)	500 mcg	25%	500 mcg	25%	1 mg 50%
Manganese	5 mg	250%	5 mg	250%	10 mg 500%
(as Chelazome®)					
Molybdenum	75 mcg	100%	75 mcg	100%	150 mcg 200%
(as Amino Acid Chelate)					
Isoflavone	300 mg	*	300 mg	*	600 mg *
Strontium Citrate	100 mg	*	900 mg	*	1000 mg *
Montmorillonite	75 mg	*	75 mg	*	150 mg *
Boron (as Proteinite)	2.5 mg	*	2.5 mg	*	5 mg *
* % Daily Value not established					

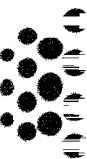
Other Ingredients: Natural vegetable capsules, Cranberry Juice Concentrate and Turmeric Root Extract. This product may contain one or more of the following: Ascorbyl Palmitate, Microcrystalline Cellulose, Magnesium Stearate and Silicon Dioxide. Chelazome® and Citrimal® are registered trademarks of Albion, Inc. † This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

Mfg. by: Ortho Molecular Products, Inc. 3017 Business Park Drive, Stevens Point, WI 54481

OrthoMolecularProducts.com

Reinforce Fiber, Matrix Reinforce Fiber, Matrix Reinforce Fiber, Matrix Reinforce Fiber, Matrix Reinforce Fiber, Matrix Reinforce Fiber, Matrix

Suggested Use: As a dietary supplement, 2 packets per day taking one Clear / White packet in the AM and one Clear / Clear packet in the PM. Maintenance: 1 packet per day alternating 1 Clear / White packet on odd days and 1 Clear / Clear packet on even days or as recommended by your health care professional. Formulated to be free of allergens derived from: Gluten, corn, egg, dairy, peanuts, artificial colors and flavors. If you are pregnant or nursing, consult your physician before taking this product. As with all dietary supplements, some individuals may not tolerate or may be allergic to the ingredients used. Please read the ingredient panel carefully prior to ingestion. Cease taking this product and consult your physician if you have negative reactions upon ingestion. KEEP CONTAINER TIGHTLY CLOSED. STORE AT ROOM TEMPERATURE. KEEP OUT OF REACH OF CHILDREN. This product was sealed for your protection. Do not use if outer logoed neck seal or printed inner seal are missing or damaged.



Beca

Pro
Premium B

Label ID L-OMP100-350060-D



Also Excellent for:

Women's Health

Dietary Supplement Product #350